

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

**DECLARATION OF MATTHEW BUSH IN SUPPORT OF DEFENDANTS'
REPLY IN SUPPORT OF DEFENDANTS' OBJECTIONS TO THE
SPECIAL MASTER'S ORDER DENYING DEFENDANTS' MOTION TO
COMPEL AN INSPECTION OF DR. WILLIAM LONGO'S
LABORATORY**

I, Matthew Bush, declare as follows:

I am an attorney of the state of New York and a partner with the law firm King & Spalding LLP, counsel for Defendants Johnson & Johnson and LLT Management LLC in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Reply In Support Of Defendants' Objections To The Special Master's Order Denying Defendants' Motion To Compel An Inspection Of Dr. William Longo's Laboratory.

1. Attached hereto as **Exhibit AL** is a true and correct copy of the transcript of Mr. Hess's deposition that took place July 10, 2024 in the above-captioned matter.

2. Attached hereto as **Exhibit AM** is a true and correct copy of Exhibit 17 to Mr. Hess's deposition, which is a demonstrative with an image from Dr. Longo's *Valadez* report (*see* Exhibit K) and a reference image of chrysotile in ISO 22262-1 (*see* Exhibit I).

3. Attached hereto as **Exhibit AN** is a true and correct copy of an excerpt of the June 12, 2024 hearing before the Special Master.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 29, 2024



MATTHEW L. BUSH